

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**IN RE: VALEANT  
PHARMACEUTICALS  
INTERNATIONAL, INC. SECURITIES  
LITIGATION**

Civil Action No. 15-7658

JUDGE MICHAEL A. SHIPP  
JUDGE LOIS H. GOODMAN

THIS DOCUMENT RELATES TO:

JUDGE DENNIS CAVANAUGH, RET.  
SPECIAL MASTER

18-cv-15286-MAS-LHG (Northwestern  
Mutual Life Insurance Co.)

**STIPULATION AND ORDER**

WHEREAS, plaintiffs in *Northwestern Mutual Life Insurance Co., et al. v. Valeant Pharmaceuticals International, Inc., et al.*, No. 18-cv-15286-MAS-LHG (“Plaintiffs”), filed a Complaint against Valeant Pharmaceuticals International, Inc. (n/k/a Bausch Health Companies Inc.), J. Michael Pearson, and Robert L. Rosiello (together, “Defendants,” and together with Plaintiffs, the “Parties”);<sup>1</sup>

WHEREAS, Federal Rule of Civil Procedure 26(a)(1)(C) requires that parties exchange initial disclosures at or within 14 days after the parties’ 26(f) conference unless a different time is set by stipulation or court order;

WHEREAS, on October 12, 2018, the Court entered Case Management Order No. 1 (ECF No. 59), coordinating for pretrial purposes the Securities Class Action *In re Valeant Pharmaceutical International, Inc. Sec. Litig.*, Master No. 3:15-cv-7658-MAS-LHG with related securities opt-out actions;

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<sup>1</sup> Claims against Howard B. Schiller and Tanya Carro have been dismissed. *See Northwestern Mut. Life Ins. Co., et al. v. Valeant Pharm. Int’l, Inc., et al.*, No. 18-cv-15286-MAS-LHG (ECF Nos. 17, 19) & Order (ECF No. 53).

WHEREAS, counsel for the Parties have conferred and agreed to a schedule for exchanging initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure;

IT IS HEREBY STIPULATED AND AGREED, by the undersigned counsel on behalf of the Parties, that all Parties shall have until April 3, 2020 to submit their initial disclosures.

Stipulated and agreed to by:

Dated: March 24, 2020

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Dated 03/25/2020

So Ordered:

A handwritten signature in black ink, appearing to read "Lois H. Goodman", written over a horizontal line.

LOIS H. GOODMAN, USMJ